

# Exhibit No. 37

<b>Exhibit No:</b>	_____
<b>Issue:</b>	<b>Limited-Income Customer Programs Medically Vulnerable Customer Programs Late Fees and Disconnections COVID Response</b>
<b>Witness:</b>	<b>Julie Trachsel</b>
<b>Type of Exhibit:</b>	<b>Rebuttal Testimony</b>
<b>Sponsoring Party:</b>	<b>Spire Missouri Inc.</b>
<b>Case No.:</b>	<b>GR-2021-0108</b>
<b>Testimony Date:</b>	<b>June 17, 2021</b>

**SPIRE MISSOURI INC.**

**CASE NO. GR-2021-0108**

**REBUTTAL TESTIMONY**

**OF**

**JULIE TRACHSEL**

**JUNE 17, 2021**

**TABLE OF CONTENTS**

**REBUTTAL TESTIMONY OF JULIE TRACHSEL..... 1**

**I. PURPOSE OF TESTIMONY ..... 2**

**II. LIMITED-INCOME PROGRAMS ..... 2**

**III. MEDICALLY VULNERABLE CUSTOMER PROGRAMS..... 9**

**IV. LATE FEES AND DISCONNECTIONS ..... 10**

**V. COVID RESPONSE ..... 11**

1 **REBUTTAL TESTIMONY OF JULIE TRACHSEL**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Julie Trachsel and my business address is 800 Market Street, St. Louis, Missouri  
4 63101.

5 **Q. WHAT IS YOUR PRESENT POSITION?**

6 A. I am employed by Spire Missouri Inc. (“Spire” or “Company”) as the Manager of Customer  
7 Experience Operations.

8 **Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND BRIEFLY  
9 DESCRIBE YOUR RESPONSIBILITIES.**

10 A. I have been the Manager of Customer Experience Operations for 1 year and 3 months. I  
11 manage the Connect Center (internal call center) and partner with our third-party call  
12 centers to ensure we are providing high quality, effortless customer interactions for all  
13 inbound and outbound customer service contacts.

14 **Q. WHAT WAS YOUR PROFESSIONAL EXPERIENCE PRIOR TO ASSUMING  
15 YOUR CURRENT POSITION?**

16 A. I have worked for Spire for over 21 years in several departments. Prior to my current  
17 position, I managed the Community Services Department at Spire for over 8 years. In that  
18 position, I managed the various customer assistance funding programs Spire offers, along  
19 with the federal, state and local funding Spire receives. In this department, my team also  
20 worked escalated complaints that come through organizations such as the Missouri Public  
21 Service Commission (“Commission”), Better Business Bureau, and the Attorney General. I  
22 have also led teams in the Financial Reporting Department and worked as an analyst in the  
23 Gas Accounting Department.

24 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

1 A. I earned my Bachelor of Science – Business Administration degree from the University of  
2 Missouri-St. Louis and my Master of Business Administration degree from Missouri  
3 Baptist University.

4 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THIS COMMISSION?**

5 A. Yes. I was a witness in formal complaint Case No. GC-2019-0331.

6 **I. PURPOSE OF TESTIMONY**

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. The purpose of my testimony is to respond to the testimony filed by witnesses Jacqueline  
9 Hutchinson on behalf of Consumers Council of Missouri (“Consumers Council”), Jennifer  
10 Heggemann on behalf of Legal Services of Eastern Missouri (“LSEM”), and Roger Colton on  
11 behalf of the National Housing Trust (“NHT”). I will provide additional information  
12 regarding the Company’s response to the COVID-19 pandemic and the programs Spire has  
13 available to those affected by the pandemic. I will also discuss the Company’s limited-income  
14 customer programs, the Company’s current program for the medically vulnerable customers,  
15 and late fees and disconnection charges.

16 **Q. WHAT SCHEDULES ARE YOU ATTACHING TO YOUR TESTIMONY?**

17 A. No Schedules are being attached.

18 **II. LIMITED-INCOME PROGRAMS**

19 **Q. WHAT LIMITED-INCOME PROGRAMS DOES SPIRE OFFER TO ITS**  
20 **CUSTOMERS?**

21 A. Spire offers several programs to our limited-income customers to help ease the costs of their  
22 energy burden. The Company has continued its customer outreach efforts, which are designed  
23 to inform customers of Spire’s programs. In 2019, Spire held 84 outreach events and in 2020,  
24 Spire held 52 outreach events. The 2020 decrease in outreach events is due to limitations

1 caused by the COVID-19 pandemic. During these events, Spire personnel educates agency  
2 employees and customers on the various programs that Spire offers and also includes  
3 education on the Low-Income Home Energy Assistance Program (“LIHEAP”). Spire works  
4 with its customers to find the appropriate programs for each customer’s situation. The  
5 Registered Customer Program provides extra disconnection protection during the months of  
6 November – March. More details regarding this program will be discussed below. The  
7 Medical Emergency Certification Program stops a disconnection for households experiencing  
8 a medical crisis that is certified by a doctor. Spire also offers the Extended Due Date Program,  
9 which allows a longer period of time to make a payment before a late fee is assessed. Along  
10 with these programs, Spire assists customers using the Limited-Income Program funds,  
11 DollarHelp funds, and the Cold Weather Payment Arrangement. There are other proactive  
12 measures that Spire completes for our Limited-Income customers, including outbound calls  
13 to reconnect services using DollarHelp funds, reaching out to agencies to pledge crisis funds  
14 on accounts that are in threat of disconnection, and offering assistance with filling out  
15 LIHEAP applications.

16 **Q. WHAT DOES THE CONSUMERS COUNCIL RECOMMEND FOR LIMITED**  
17 **INCOME PROGRAMS IN THIS CASE?**

18 A. Witness Hutchinson recommends that the annual funding for the Spire Affordability  
19 Program should be increased by fifty percent, ideally with some cost sharing from the  
20 utility’s shareholders. She also recommends the eligibility for receiving the benefits of this  
21 program should be increased to 250% of the federal poverty level (“FPL”). (Hutchinson  
22 Direct, page 8.)

1 **Q. DO YOU AGREE WITH THE ANNUAL FUNDING PROPOSED BY**  
2 **CONSUMERS COUNCIL?**

3 A. No. Spire’s proposal is to increase the eligibility for the limited-income programs from  
4 185% to 200% of the FPL. Historically, Spire has not spent all of the funds budgeted each  
5 year. With the eligibility level raised to 200% of the FPL, the number of participants and  
6 dollars spent may also increase, but we do not know by how much at this time. Spire  
7 believes a smaller increase to 200% FPL is appropriate at this time, instead of Consumers  
8 Council’s recommendation to increase eligibility to 250% of the FPL, since we do not  
9 know what the ramifications would be.

10 **Q. HOW DOES SPIRE’S PROPOSED INCREASE TO 200% FPL COMPARE TO**  
11 **OTHER UTILITIES?**

12 A. Spire’s proposal aligns well with other similar programs. The FPL for LIHEAP is 135%.  
13 It was adjusted to 60% SMI (state median income), which is approximately 200% FPL due  
14 to the pandemic beginning on April 23, 2021 through September 30, 2021. It is unknown  
15 at this time if the increase will continue past September 30, 2021. The new income  
16 guidelines for Ameren’s Keeping Current Program are up to 200% FPL, and for Ameren’s  
17 Keeping Cool Program the new income guidelines are up to 250% FPL. Ameren’s income  
18 changes are effective from April 1, 2021 to December 31, 2021.

19 **Q. DOES NHT MAKE RECOMMENDATIONS ON SPIRE’S FIXED CHARGE**  
20 **ASSISTANCE PROGRAM (“FCAP”)?**

21 A. Yes. NHT recommends eligibility for the Limited-Income program increase to 200% of the  
22 FPL and remove the funding cap through calendar 2022. (Colton Direct, page 5.) Spire’s

1 proposal is to increase the eligibility to 200% of the Federal Poverty Level. The current  
2 program also rolls over unspent funding to the next plan year.

3 **Q. DOES CONSUMERS COUNCIL HAVE OTHER RECOMMENDATIONS ON**  
4 **SPIRE'S LIMITED-INCOME PROGRAMS?**

5 A. Witness Hutchinson also recommends borrowing best practices from Ameren Missouri's  
6 Keeping Current Program. (Hutchinson Direct, pages 8-9.)

7 **Q. ARE YOU FAMILIAR WITH AMEREN MISSOURI'S KEEPING CURRENT**  
8 **PROGRAM?**

9 A. Yes. Ameren's Keeping Current Program provides bill credits and past due balance  
10 forgiveness for on-time monthly payments.

11 **Q. IS SPIRE'S PROGRAM SIMILAR TO AMEREN MISSOURI'S KEEPING**  
12 **CURRENT PROGRAM?**

13 A. Yes. When creating Spire's Limited-Income Program, Spire used Ameren's Keeping  
14 Current Program as a guide. In creating the program, Spire evaluated Ameren's program  
15 and chose the aspects of Ameren's program that Spire believed were best for our customers.  
16 As stated above, Spire's proposed increased income level is similar to what exists for  
17 Ameren currently. Additionally, Spire's Limited-Income Program also provides monthly  
18 bill credits and arrearage payment matching credits for on-time monthly payments.

19 **Q. DOES CONSUMERS COUNCIL MAKE ANY OTHER RECOMMENDATIONS**  
20 **FOR LIMITED INCOME PROGRAMS?**

21 A. Yes. Witness Hutchinson recommends an independent outside review of the past Spire  
22 affordability program, with design improvement recommendations, and that the  
23 Commission order Spire to track and report energy burden data, number of cut-offs,



1 collection actions and other data in a public manner that can be assessed by all interested  
2 parties. (Hutchinson Direct, page 8.)

3 **Q. DO YOU AGREE WITH CONSUMERS COUNCIL’S RECOMMENDATION FOR**  
4 **AN INDEPENDENT OUTSIDE REVIEW?**

5 A. No, I do not believe this is needed. Spire is in the best position to evaluate the programs it  
6 administers and the needs of its customers. Spire continually monitors all of its programs  
7 and implements adjustments, as needed, to assist more customers. Income-eligible  
8 LIHEAP customers are automatically enrolled in Spire’s Fixed Charge Assistance Program  
9 (“FCAP”) if they have \$300.00 or more in arrearages after the LIHEAP pledge. LIHEAP  
10 agencies also refer customers for enrollment when they are over income for LIHEAP,  
11 but meet the income limits for FCAP. As we continue to monitor the Limited-Income  
12 Program, we may adjust to \$100.00 or more in arrearages after the LIHEAP pledge is made.  
13 We also completed enhancements so that FCAP can be initiated through the Spire Pledge  
14 Portal. We will be training our LIHEAP agency partners on this process this winter.

15 **Q. WHAT DOES THE LEGAL SERVICES OF EASTERN MISSOURI**  
16 **RECOMMEND IN THIS CASE RELATED TO LIMITED INCOME PROGRAMS?**

17 A. LSEM Witness Heggemann recommends that the Commission reject Spire’s request for a  
18 rate increase because of the likely adverse impacts to the proposed increase on low-income  
19 natural gas service customers, which includes some of LSEM’s clients. (HeggemannDirect  
20 , page 8.)

21 **Q. DO YOU AGREE WITH LSEM’S RECOMMENDATION IN THIS CASE?**

22 A. No.

23 **Q. PLEASE EXPLAIN.**

1 A. As explained above, Spire offers several programs to address limited-income customers  
2 and to ease their energy burdens. Spire is seeking this increase to ensure we are able to  
3 continue providing safe and adequate service at reasonable rates.

4 **Q. WHAT RECOMMENDATION DOES LSEM HAVE REGARDING ACCESS TO**  
5 **SYSTEMS FOR ASSISTANCE AGENCIES TO HELP CUSTOMERS FROM**  
6 **LOSING UTILITY SERVICES?**

7 A. LSEM recommends having a system in place that will allow customer-facing staff, called  
8 “navigators” at medical facilities and assistance agencies to identify medically vulnerable  
9 customers at risk of losing utility service. These navigators would help these customers,  
10 with input from both utilities and agencies, fill out an application to help prevent utility  
11 disconnections. (Heggemann Direct, page 9.)

12 **Q. DOES SPIRE CURRENTLY ADDRESS THE SITUATION REFLECTED IN**  
13 **LSEM’S RECOMMENDATION?**

14 A. Yes. Spire has a pledge portal that over 600 agencies can log into to view customers’  
15 accounts and pledge funds to help avoid disconnections or to reconnect service. Spire also  
16 has the Community Services Department that works with agencies on outreach and  
17 education with a dedicated phone line for agencies to call if they do not have access to the  
18 pledge portal.

19 **Q. WHAT RECOMMENDATIONS DOES THE NATIONAL HOUSING TRUST MAKE**  
20 **FOR SPIRE’S LIMITED-INCOME PROGRAMS?**

21 A. Witness Colton recommends Spire continue its Customer Arrearage Payment Plan program  
22 for customers with income at or below 200% of Poverty, while eliminating the cost cap  
23 until the end of calendar year 2022. (Colton Direct, page 35.) He also recommends Spire

1 provide long-term deferred payment plans for households above that income level. (Colton  
2 Direct, page 31.) Spire currently does this by allowing all customers, no matter what  
3 income level, to sign up for the Cold Weather payment plan.

4 **Q. DOES SPIRE HAVE ANY PROGRAMS THAT ASSIST IN BUDGET CREDITS AND**  
5 **ADDRESSING ARREARAGE REDUCTIONS?**

6 A. Yes, Spire's Limited-Income Program provides budget credits and arrearage matching credits  
7 with on-time monthly payments.

8 **Q. DOES SPIRE'S LIMITED-INCOME PROGRAM APPEAR TO ALIGN WITH NHT'S**  
9 **RECOMMENDATION RELATED TO POTENTIAL COST SAVINGS TO SPIRE**  
10 **FROM A TARGETED USAGE REDUCTION PROGRAM?** (Colton Direct, page 64.)

11 A. I believe it does. By making on-time payments, the arrearage portion of the payment is  
12 matched by Spire, further reducing the overall arrearage amount.

13 **Q. WHAT IS YOUR RESPONSE TO NHT'S RECOMMENDATION THAT SPIRE'S**  
14 **PROPOSED INCOME-ELIGIBLE ENERGY EFFICIENCY PROGRAMS BE**  
15 **APPROVED AND ALL BUDGETS BE FULLY SPENT, INCLUDING ANY UNSPENT**  
16 **FUNDS FROM PREVIOUS YEARS OR QUARTERS?** (Colton Direct, page 68.)

17 A. Currently, the unspent funds from these programs roll over into the next year existing from  
18 April to April. This rollover is beneficial because it provides a way to ensure ongoing  
19 assistance.

20 **Q. HOW LONG DOES NHT RECOMMEND THE INVESTMENT CONTINUE?**

21 A. Indefinitely.

22 **Q. DO YOU AGREE WITH THE TIMEFRAME PROPOSED BY WITNESS COLTON?**

1 A. Spire believes the more appropriate approach is to continually evaluate the program on a  
2 yearly basis to ensure that Spire best serves its customers and their needs.

3 **III. MEDICALLY VULNERABLE CUSTOMER PROGRAMS**

4 **Q. DOES SPIRE HAVE A PROGRAM TO ASSIST ITS CUSTOMERS WHO HAVE**  
5 **CHRONIC OR SERIOUS MEDICAL CONDITIONS?**

6 A. Yes. The Registered Customer Program provides extra disconnection protection during the  
7 months of November – March. This program applies to any customer that is disabled and/or  
8 elderly (65+). Customers complete an application, which then puts their account in a status  
9 that provides for extra notification prior to disconnection during the months of November –  
10 March. Customers enrolled in the program can designate a third party that will be contacted  
11 prior to disconnecting service for nonpayment. They are also mailed a renewal application in  
12 September. Spire’s Medical Emergency Certification program stops a disconnection for  
13 households experiencing a medical crisis certified by a doctor. Customers submit an  
14 application, which grants them a 21-day extension before payment is due. Spire also offers  
15 the Extended Due Date Program which allows a longer period of time to make a payment  
16 before a late fee is assessed.

17 **Q. DOES SPIRE RECOMMEND ANY CHANGES TO ITS CURRENT PROGRAM FOR**  
18 **CUSTOMERS WITH CHRONIC OR SERIOUS MEDICAL CONDITIONS?**

19 A. Not at this time, but Spire is willing to discuss its current programs in more detail with any  
20 party that has questions or further recommendations.

21 **Q. DOES THE CONSUMERS COUNCIL RECOMMEND THAT SPIRE CREATE A**  
22 **MEDICAL REGISTRY PROGRAM?**

23 A. Yes.

1 **Q. DO YOU AGREE WITH THE RECOMMENDATION THAT SPIRE SHOULD**  
2 **CREATE A MEDICAL REGISTRY PROGRAM?**

3 A. No, because as explained above Spire already has a Registered Customer Program similar  
4 to that described by Consumers Council.

5 **Q. WHAT DOES THE LEGAL SERVICES OF EASTERN MISSOURI'S**  
6 **RECOMMEND IN THIS CASE?**

7 A. Witness Heggemann recommends the Commission order Spire to explore establishing and  
8 participating in a program designed to help ensure that medically vulnerable low-income  
9 customers are adequately protected from disconnection of their natural gas service where  
10 continuation or resumption of that service is critical to preservation of their health and  
11 safety. (Heggemann Direct, page 3.)

12 **Q. DO YOU AGREE WITH THE RECOMMENDATIONS PROPOSED BY LEGAL**  
13 **SERVICES OF EASTERN MISSOURI?**

14 A. No. We currently have a program in place that offers the disconnection protection for  
15 customers enrolled in the program during the months of November – March.

16 **IV. LATE FEES AND DISCONNECTIONS**

17 **Q. WHAT RECOMMENDATIONS DOES THE NATIONAL HOUSING TRUST MAKE**  
18 **FOR SPIRE'S PAYMENT PLANS?**

19 A. Witness Colton recommends modifications to Spire's practices and procedures that will  
20 improve both the effectiveness and the efficiency of the Company's use of deferred payment  
21 plans as a collection tool for unpaid bill balances. (Colton Direct, page 39.) He goes on to  
22 recommend that Spire offer a payment plan term of not less than 12 months. Witness Colton

1 recommends Spire adopt flexible payment agreement terms to retire arrears, including arrears  
2 for customers who are not income-eligible for the Customer Arrearage Payment Plan program.

3 **Q. DO YOU AGREE WITH THIS PROPOSAL?**

4 A. It is unclear if he is proposing anything different than what Spire currently offers its customers.  
5 Spire's payment plans are for 12 months in duration, as is the Cold Weather Rule payment  
6 plan. If a customer is not income-eligible for arrearage relief then that customer could qualify  
7 for a 12-month payment under the Cold Weather Rule (Chapter 13) or for the budget credit  
8 piece of the Limited-Income program.

9 **Q. CONSUMERS COUNCIL RECOMMENDS ELIMINATING LATE FEES,  
10 RECONNECTION FEES, AND COLLECTION TRIP CHARGES, DO YOU AGREE?**

11 A. No. Spire encourages customers in those situations to contact our offices so that Spire can  
12 help address any problems, challenges, or difficulties they are experiencing. Sometimes  
13 customers do not call until they see additional charges on their bill and that call allows Spire  
14 to share the programs and assist the customers who clearly need help. Without those charges  
15 it is possible those customers would not receive benefits they are eligible to receive. This  
16 communication helps Spire assist its customers and helps them take full advantage of the many  
17 programs Spire offers to help in certain situations. These types of charges also allow the  
18 Company to recover costs associated with visits.

19 **V. COVID RESPONSE**

20 **Q. DID THE WITNESSES FOR NATIONAL HOUSING TRUST DISCUSS THE  
21 EFFECTS OF COVID ON LIMITED-INCOME CUSTOMERS?**

22 A. Yes.

1 **Q. WHAT RECOMMENDATIONS DOES THE NATIONAL HOUSING TRUST MAKE**  
2 **FOR SPIRE’S PAYMENT PLANS AS IT RELATES TO THE COVID-19**  
3 **PANDEMIC?**

4 A. NHT recommends that during the pendency of the COVID-19 pandemic, and associated  
5 economic crisis, customers who can demonstrate that they have income at or below 50% of  
6 Poverty (“Extreme Poverty”) should be given an adjusted FCAP credit of \$25 per month for  
7 the 12 months of the year (rather than the existing \$20/month discount) and \$35 per month  
8 for the cold weather months of November through April (rather than the existing \$30 per  
9 month discount.) (Colton Direct, pages 46.)

10 **Q. HOW DO YOU RESPOND TO THIS RECOMMENDATION FOR EXPANDED**  
11 **DISCOUNT AS PROPOSED BY NHT?**

12 A. Spire is proposing \$35 per month budget credit for customers that make on time monthly  
13 payments. This change will allow customers to receive one monthly bill credit that remains  
14 the same throughout the year and provides more certainty to the customer as to what will be  
15 included in the utility bill.

16 **Q. DOES NHT HAVE OTHER RECOMMENDATIONS REGARDING SPIRE’S**  
17 **RESPONSE TO COVID-19?**

18 A. Yes. Witness Colton recommends Spire implement a grass-roots, boots-on-the-ground  
19 outreach for its COVID responses that relies on community-based “trusted messengers” to  
20 help identify and enroll eligible customers in initiatives. He recommends including suspension  
21 of disconnections, expansion of rate assistance, Arrearage Repayment Program, and long-term  
22 deferred payment arrangements. (Colton Direct, page 60.)

1 **Q. HOW DO YOU RESPOND TO THIS RECOMMENDATION?**

2 A. Spire partners with over 600 agencies in Missouri to provide education regarding Spire's  
3 programs, along with other energy assistance programs, including the federally funded  
4 LIHEAP program. We host and attend various outreach events every year. These partner  
5 agencies assist Spire in reaching across the state, in rural and urban areas. When appropriate,  
6 Spire suspends disconnections due to various circumstances. During COVID-19, Spire  
7 suspended disconnections for spring and summer of 2020. During other times, Spire has  
8 suspended disconnections due to upcoming weather predictions and around holidays.

9 **Q HOW DID SPIRE ADDRESS COVID-19 AND THE EFFECTS IT HAD ON ITS**  
10 **CUSTOMERS, INCLUDING LIMITED-INCOME CUSTOMERS?**

11 A. Spire addressed COVID-19 impacts on its customers by expanding its current limited-income  
12 programs, suspending disconnections to customers when the impacts of COVID-19 were at  
13 its worse, along with a variety of other measures. The Company's response to COVID-19 is  
14 further addressed in more detail in the rebuttal testimony of Scott Weitzel.

15 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

16 A. Yes.



**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**


In the Matter of Spire Missouri Inc.'s d/b/a )  
Spire Request for Authority to Implement a General )  
Rate Increase for Natural Gas Service Provided in ) **Case No. GR-2021-0108**  
the Company's Missouri Service Areas )

AFFIDAVIT

STATE OF MISSOURI )  
 ) SS.  
CITY OF ST. LOUIS )

Julie Trachsel, of lawful age, being first duly sworn, deposes and states:

1. My name is Julie Trachsel. I am Manager of Customer Experience Operations at Spire Missouri Inc. My business address is 800 Market St., St. Louis, Missouri, 63101.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony on behalf of Spire Missouri Inc.
3. Under penalty of perjury, I declare that my answers to the questions contained in the foregoing rebuttal testimony are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Julie Trachsel  
6/17/21  
\_\_\_\_\_  
Date